

From: [Klemesrud, Jon](#)
To: [Becky Shull](#)
Cc: [Levo, Brian](#); [Kenknight, Jeff](#); [Rife, Annette M.](#); Sarah.Hansen@deg.idaho.gov
Subject: NPDES Compliance Evaluation Inspection at Atlanta Gold Corporation
Date: Thursday, July 18, 2019 9:52:00 AM
Attachments: [IDG910006 Atlanta Gold Corporation NPDES Inspection Report.pdf](#)
[image003.png](#)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 155
Seattle, Washington 98101-3140

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

Ms. Becky Shull
Executive Assistant
Atlanta Gold Corporation
bshull@atlanta.gold.com

Re: NPDES Compliance Evaluation Inspection at Atlanta Gold Corporation located in
Atlanta, Idaho

Dear Ms. Shull:

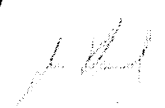
On May 14, 2019, the United States Environmental Protection Agency (EPA) conducted a compliance inspection at your facility. The purpose of the inspection was to determine compliance with the Clean Water Act (CWA), specifically, compliance with the facility's National Pollutant Discharge Elimination System (NPDES) Permit No. IDG910006. A copy of the inspection report is attached to this email. Please review the inspection report, note the areas of concern (if any), and take any actions necessary to ensure compliance with the CWA.

An EPA Compliance Officer will use this inspection report in evaluating your facility's compliance with the CWA. This may result in subsequent contact from EPA personnel if a violation is identified. This message is sent only to transmit the inspection report, and it should not be interpreted as a final compliance determination. Please direct any questions regarding compliance evaluation to Brian Levo at levo.brian@epa.gov.

Thank you for the cooperation and assistance extended to EPA personnel during the inspection.

Sincerely,

/s/


Jon Klemesrud
NPDES Compliance Inspector

Attachments:

1. IDG910006 Atlanta Gold Corporation NPDES Inspection Report

cc: Brian Levo
NPDES Enforcement Coordinator



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 1	I D G 9 1 0 0 6	1 9 0 5 1 4	C	R	2
Remarks					
21					
66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 1 69	70	71	72	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
Atlanta Gold Corporation 1.5 Miles South of Atlanta on Mine Hill Road Atlanta, Idaho 83601	10:30AM 05/14/19	07/01/2007
	Exit Time/Date	Permit Expiration Date
	01:30PM 05/14/19	06/30/2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Becky Shull - Executive Assistant & EMS Tech - (208) 424-3343 bshull@atlanta.gold.com	NAICS 212221 Gold Ore Mining	
Jim Inama - Site Supervisor & Water Treatment Operator (208) 864-2198	Lat/Long: +43.790432 -115.111169	
Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted	
Allan Folk - President (416) 417-7780 (cell) Atlanta Gold Corporation P.O. Box 94 Star, Idaho 83669	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
• • • • •	
• • • • •	
• • • • •	
• • • • •	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jon Klemesrud	USEPA R10/ECAD/FDDWES (206) 553-5068	05/20/2019
Sarah Hansen	IDEQ/Boise Regional Office (208) 373-0397	
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
	EPA/FDDWES 206 553 6708	2.16.19

1015
5/20/19

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

***National Pollutant Discharge Elimination System
(NPDES) Inspection Report***

***Atlanta Gold Corporation
Atlanta, Idaho
NPDES Tracking #IDG910006***

Prepared by:

***Jon Klemesrud
Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Field, Data, & Drinking Water Enforcement Section***

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Attachment A: Aerial Image

Attachment B: Photograph Log

Attachment C: ICIS 5-year Exceedance Report

Attachment D: May 23, 2019 Email Correspondence with Becky Shull

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Becky Shull or Jim Inama, or from observations made during the inspection.]

I. Facility Information

Facility Name: Atlanta Gold Corporation

Facility Contacts: Becky Shull – Executive Assistant & EMS Tech
Atlanta Gold Corporation
(208) 424-3343
bshull@atlanta.gold.com

Jim Inama – Site Supervisor & Water Treatment Operator
Atlanta Gold Corporation
(208) 422-5849

Allan Folk – President
Atlanta Gold Corporation
416-417-7780

NAICS Code: 212221 – (Gold Ore Mining)

Facility Address: 1.5 Miles South of Atlanta, Idaho, on Mine Hill Road

GPS: N 43.790432 W -115.111169

Mailing Address: P.O. Box 94
Star, Idaho 83669

NPDES Tracking Number: IDG910006

II. Inspection Information

Inspection Date: May 14, 2019

Inspectors: Jon Klemesrud, Inspector
USEPA Region 10, ECAD / FDDWES
(206) 553-5068

Sarah Hansen – IPDES Compliance Officer
Idaho Department of Environmental Quality
(208) 373-0397

Arrival Time: 10:30 AM

Departure Time: 01:30 PM

Purpose: Document compliance with EPA's National Pollutant Discharge Elimination System (NPDES) General Permit Tracking No. IDG910006 for Groundwater Remediation Discharge Facilities in Idaho.

III. Permit Information

Atlanta Gold Corporation is currently authorized to discharge water from the 900 Level Adit to Montezuma Creek under the NPDES General Permit for Groundwater Remediation Discharge Facilities in Idaho. Authorization was granted on August 6, 2009. The IDG910000 Permit became effective on July 1, 2007 and expired on June 30, 2012. Permit coverage was administratively extended upon expiring.

In 2014, the IDG910000 General Permit was reissued as IDG911000, the reissuance did not include coverage for discharges from mining operations covered by an administrative extension of the previous General Permit (NPDES Permit No. IDG910000). The ID911000 Permit Fact Sheet states that EPA intends to issue a mining-specific general permit at a later date and "those mining which have extended coverage under the previous permit must continue to operate in compliance with the limits and conditions of IDG910000 until a new permit is issued."

IV. Background

The Atlanta Gold Corporation (AGC) is a wholly-owned subsidiary of Atlanta Gold Inc. AGC operates the Atlanta Gold Project, consisting of an historic mining adit known as the 900 Level Adit and the associated water treatment facility. See Attachment A, Aerial Image.

The 900 Level Adit is located at the site of an historic mining adit and tunnel, approximately 1.5 miles from the remote town of Atlanta, Idaho. Atlanta, Idaho is an unincorporated community within Elmore County, Idaho. Access can be limited as approximately 40 miles of unimproved roads are required for travel.

The 900 Level Adit was originally drilled in 1917 as part of the historic Talache Mine and was purchased by Atlanta Gold in 1985 along with other mining claims and mining operations. Atlanta Gold has never processed or produced ore at the 900 Level Adit site but has conducted exploratory drilling activities.

Groundwater flows from the adit and discharges to Montezuma Creek, a tributary of the Middle Fork of the Boise River. The groundwater leaving the adit has historically contained higher levels of arsenic and iron. According to the facility, the adit discharge of groundwater is a condition that existed prior to AGC's leasing of the property, and the first action to treat the historic mine drainage was by AGC in 1994 for exploration underground drilling. AGC operates a water treatment facility to treat the NPDES permitted discharge from the historic 900 Level Adit to Montezuma Creek.

Daily operations at the 900 Level Adit are handled by Atlanta, Idaho residents Jim Inama and Joe Inama, who are employed by AGC. Prior to 2018, daily operations were primarily handled by Jim and Joe Inama's brother, John Inama.

AGC previously had an administrative office in Boise, Idaho; in August of 2018 they informed EPA via letter of an address change to P.O. Box 94 in Star, Idaho. Becky Shull, AGC Executive Assistance/EMS Tech, operates out of the administrative office. Ms. Shull manages the site's official records, as well as the reporting and handling of AGC's monitoring data.

AGC's longtime President and Chief Executive Officer Wm. Ernest Simmons resigned from the company on June 30, 2017. Allan Folk, the current AGC President, was confirmed February 25, 2019 and currently resides in Toronto, Ontario, Canada.

At the time of inspection, AGC had an ongoing lawsuit within the United States District Court, for the District of Idaho, to address Clean Water Act compliance issues at the 900 Level Adit site. Plaintiffs include: Idaho Conservation League and Northwest Environmental Defense Center (collectively, "ICL"), case No. 1:11-cv-00161-REB.

AGC was last inspected by EPA on June 25, 2014.

V. Inspection Chronology

I was joined on the inspection by Sarah Hansen, IPDES Compliance Officer with the Idaho Department of Environmental Quality. Ms. Hansen's role during the inspection was for shadowing purposes only.

One day prior to the inspection, I called the main office number for AGC and spoke with Becky Shull, AGC's Executive Assistant/EMS Tech. I announced the inspection to confirm that a facility representative would be available at site the following day. Ms. Shull informed me that Jim Inama, the Site Supervisor & Water Treatment Operator would be able to accompany us for the inspection. Mr. Inama lives in Atlanta, Idaho and has been employed by AGC in his current, part-time position since the spring of 2018.

Ms. Shull also informed me that currently the only way into Atlanta, Idaho was from Arrowrock dam (N. Fork Boise River Road), the two other access routes had yet to be opened for travel as a result from the previous winter's conditions.

I arrived with Ms. Hansen at the 900 Level Adit site at approximately 10:30AM on May 14th, 2019. Upon arrival, we met with Jim Inama, I identified myself as an EPA inspector, presented my credentials, and provided him with my business card. I informed him that the purpose of the visit was to conduct a compliance inspection under the Clean Water Act, specifically related to their coverage under the NPDES Permit.

Mr. Inama accompanied us throughout the inspection. The EPA inspection consisted of an opening conference to conduct initial introductions, and to discuss the purpose and

expectations of the inspection. The inspection included a facility tour followed by a brief records review. A closing conference was held with Mr. Inama, where I discussed my inspection observations. Following the inspection, additional records kept at the AGC administrative office were provided by Ms. Shull electronically and reviewed.

VI. Facility Review

The facility tour was centered on the 900 Level Adit associated wastewater treatment facility. Photographs taken during the inspection can be found in Attachment B, Photograph Log.

Access to the facility, including the 900 Level Adit and associated water treatment facility, is controlled by a locked gate off of Mine Hill Road. The adit is located on the south end of the fenced property, near the water treatment facility. Water treatment consists of 2 lined settling ponds, 2 solids filter boxes, and 4 sub-surface filter tanks. The entire system is gravity fed.

Located approximately 200ft inside the 900 Level Adit, water is primarily blocked behind an 8-foot stub wall. The stub wall is equipped with two 6-inch pipe outlets, which historically routed water (via HDPE piping) from behind the stub wall into two solids filtering boxes (Tank #5 & #6), which are located outside of the adit tunnel.

The filtering boxes (Tanks #5 & #6) are rectangular in shape, both are open-faced and equipped with optional roofing. According to Mr. Inama, both filter tanks were filled with 3/8-inch gravel at the time of inspection.

Mr. Inama stated that approximately two years ago, AGC disconnected the two 6-inch pipes that were connected to the stub wall and retrofitted an old air utility line to transfer water from behind the bulkhead to Tank #5. This process change was made to address freezing issues experienced during winter months with the two pipes that were connected to the stub wall. At the time of the inspection, the utility line was discharging to Tank #5 and Tank #6 was being used as an overflow (if needed). Water leaving Tank #5 and Tank #6 combine and discharge to the settling ponds.

In addition to the utility line, water is also captured from a sump located at the entrance to the adit. Water seeping from the bulkhead travels via sheet flow into the sump and is gravity fed to the settling ponds via piping.

According to Mr. Inama, prior to his employment with AGC, the facility would treat water discharging from the sump with ferric sulfate and hydrated lime. At the time of inspection, the facility had a small quantity of ferric sulfate stored in one of two shipping ("CONEX") containers located south of the ponds. Mr. Inama believed the treatment stopped at this stage because it wasn't effective.

Prior to entering the settling ponds, the two influent flows pass through their own designated 6-inch Parshall Flume for flow measurement. The combined Tank #5 & #6

discharge is routed to the "lower" Parshall Flume and the adit sump discharge is routed to the "upper" Parshall Flume. Both influent flows then combine and discharge to the settling ponds. According to Mr. Inama, the two influent flows are recorded twice a day, once in the morning and once in the afternoon.

The two settling ponds used at the treatment facility are referred to as the North Pond and South Pond, both ponds are lined and connected via a middle channel.

According to Mr. Inama, the facility has the ability to route flow to either pond, as well as the ability to discharge from either pond (to the filter tanks). At the time of inspection, the facility was routing influent to both of the ponds simultaneously. Mr. Inama said this was due to the observed high influent flow that is typically experienced during spring runoff. Mr. Inama stated that he believes the ponds were emptied and cleaned out approximately 3 years ago.

Water is gravity fed from the ponds into 4 filter tanks (Tanks #1, #2, #3, and #4) via underground piping. Tanks #1 and #2 are located north of facility's access road, Tanks #3 and #4 are located on the south of the facility's access road.

Tanks #1 and #2 are two-celled tanks buried just below the ground surface. Each cell can be accessed via an above-ground hatch. According to Mr. Inama, within the two-cell tanks there is layered filter fabric, 3/8 gravel, and silica sand. Mr. Inama also stated that Cell #1 (Tank #1) and Cell #3 (Tank #2) has Zero-Valent-Iron (ZVI) added to the filtration media.

Tanks #3 and #4 are partially buried and can be accessed via a side hatch. According to Mr. Inama, both tanks contain similar filtration materials as Tanks #1 and #2, without the added ZVI. The two sets of filter tanks can be operated in series or in parallel.

After the filtering process, flow is routed to a covered effluent Parshall Flume located east of Tank #2 on the north end of the facility access road. From the effluent Parshall Flume, water is piped into Montezuma Creek through Outfall 001.

According to Mr. Inama, influent/effluent flow and pH is recorded twice a day, once in the morning and once in the afternoon. The facility conducts weekly sampling for the remaining effluent parameters listed in their permit, which include: Total Suspended Solids (TSS), Arsenic, Iron, and Temperature. Samples are typically collected on Mondays.

As required by Enclosure 1 of their permit (Part B. Instream Chemical Monitoring), monthly monitoring of temperature and arsenic is sampled above and below Outfall 001. The facility's upstream sample is noted as "AG 26" on the Chain of Custody Records and associated Laboratory Analysis Reports.

Weekly and monthly samples that are collected by AGC staff for permit compliance are analyzed by Analytical Laboratories, Inc. in Boise Idaho. The facility contracts with

Danielson Transportation Inc. to transport the samples between Atlanta, Idaho and Analytical Laboratories, Inc.

VII. Records Review

The following documents were reviewed:

- Operations and Maintenance Plan – The facility submitted a copy of their updated (2014) O&M Plan to EPA on August 25, 2014. It was reviewed as part of a file review prior to the inspection.
- Quality Assurance Project Plan – The facility submitted a copy of their updated (2014) Quality Assurance Project Plan to EPA on August 25, 2014. It was reviewed as part of a file review prior to the inspection.
- Discharge Monitoring Reports (DMRs) – I reviewed the last 5 years of DMRs prior to the inspection. This was completed by a review of a violations report generated by EPA's Integrated Compliance Information System (ICIS). I also reviewed the associated Non-Compliance Reports that were submitted with the DMRs for years 2017 - 2019 (to date).
- Monitoring Records – Following the inspection, I reviewed the requested monitoring records provided to me by Ms. Shull. This included analytical data and chain of custody documentation for the following sampling events: 6/5/2017, 6/12/2017, 6/19/2017, 6/26/2017, 10/2/2017, 10/11/2017, 10/16/2017, 10/30/2017, 5/07/2018, 5/14/2018, 5/21/2018, 5/29/2018, 9/04/2018, 9/10/2018, 9/18/2018, 9/24/2018.
- Daily Report – I reviewed a copy of the facility's Daily Report Form at the time of inspection. The copy reviewed was for the week of 5/12/2019. Twice each day, pH and flow are reported on the form. Completed forms are sent to Ms. Shull every week from the facility.

VIII. Areas of Concern

Observations during the inspection included the identification of five areas of concern. The areas of concern are described as follows:

A: Effluent Limitation Exceedances

Section II.A.9 of the permit states that discharges must comply with the effluent limitations specified in Table 1 of the authorization letter:

Table 1. Effluent Limitations and Monitoring Requirements

Parameter	Effluent Limit (Maximum Daily Limit)	Monitoring Frequency	Sample Type
Total Suspended Solids (TSS)	30,000 µg/l	Weekly ¹	grab
Arsenic	10 µg/l	Weekly ¹	grab
Iron	1,000 µg/l	Weekly ¹	grab
Flow	Report	Continuous	recording
Temperature	19°C ²	Weekly ¹	grab
pH	6.5 – 9.0 s.u. (at all times)	Weekly ¹	grab

¹ Weekly sampling is required as long as the facility is discharging.

² A maximum temperature limit of 9°C applies to the discharge during periods of salmonid spawning.

Reviewing AGC reported 5-year effluent data, using EPA's Integrated Compliance Information System (ICIS), for 33 months the facility exceeded the maximum daily limit of 10 µg/L for Arsenic while sampling weekly as required by the permit. AGC also exceeded the maximum daily limit of 1,000 µg/L for Iron for 10 months while sampling weekly as required by the permit. The 5-year exceedances are outlined in a report generated ICIS and attached to this report as Attachment C.

B: Flow Measurement

Section II.A.9 of the permit states that discharges must comply with the effluent limitations specified in Table 1 of the authorization letter. Table 1 requires the monitoring frequency for flow to be continuous and recorded.

At the time of inspection, the facility was monitoring flow twice a day, 7-days a week using a Parshall Flume.

C: On-site Availability of Operations and Maintenance Plan

Section II.J of the permit states that the O&M Plan must be retained on-site and made available to EPA and IDEQ upon request.

At the time of inspection, Mr. Inama wasn't aware of the O&M Plan. He stated that perhaps his brother, Joe Inama, who is also an operator (afternoon shift) had access to the document.

Following the inspection, I spoke with Ms. Shull who stated that she had discussed this area of concern with Jim Inama following the inspection. She confirmed that Joe Inama had the facility copy (2014 version), and she would update the document as personnel and some operations have changed since the 2014 version. I received an email from Ms. Shull on May 23, 2019 stating that updates to the O&M Plan were completed and the document would be shared with the site operators for additional input. Once complete, it would be routed for review by President Allan Folk and then distributed. A copy of the

May 23, 2019 email from Ms. Shull is attached to this report as Attachment D.

D: Overflow at Filter Tank #2

Section III.A of the permit states that a permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by a permittee to achieve compliance with the conditions of this general NPDES permit. Proper O&M also includes best management practices, adequate laboratory controls, and appropriate quality assurance procedures.

During the facility tour, we observed Tank #1 (cell #1) and Tank #2 (cell #3) to be at maximum capacity; water was overflowing from the top of Tank #2 (cell #3) and was infiltrating nearby. At the time of inspection, Mr. Inama stated that the overflow was discovered earlier that morning during his routine site visit, he stated he hadn't had a chance to investigate the issue yet due to the EPA inspection, but most likely filter material got dislodged with the observed high flow coming from the adit and was restricting flow between the two cells within the tanks.

E: EcoSense® pH10A Meter Calibration

At the time of inspection, the facility was using an EcoSense® pH10A Meter for effluent monitoring. Mr. Inama stated that a 3-point calibration is conducted quarterly. I suggested to Mr. Inama that he review the manufacturer recommendation and the Quality Assurance Project Plan to confirm the required calibration frequency.

IX. Closing Conference

A closing conference was held with Mr. Inama, where I discussed my inspection observations and the areas of concern. I then thanked him for his time and cooperation with the inspection.

Report Completion Date:

7/16/2019

Lead Inspector Signature:

ATTACHMENT A

Aerial Image (from Google Earth Pro)



ATTACHMENT B

Photograph Log

All photographs taken by Jon Klemesrud on May 14, 2019
Nikon Coolpix AW100, Serial # 32197190

Note: At the time of inspection, the time stamp was inadvertently set to two hours behind Mountain Daylight Time.

Photo Log – Atlanta Gold Corporation



Photo #:01 (DSCN1722)

Description: Facing south, photo from just inside the 900 Level Adit.

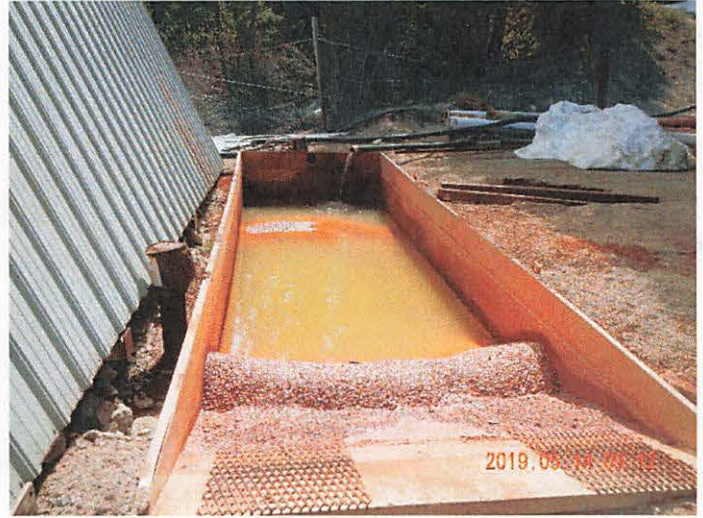


Photo #:02 (DSCN1723)

Description: Facing east, photo of Tank #5 at the time of inspection. Tank #5 is filled with 3/8-inch gravel and receives water via the utility line behind the stub wall. Tank #5's primary use is for settling solids.

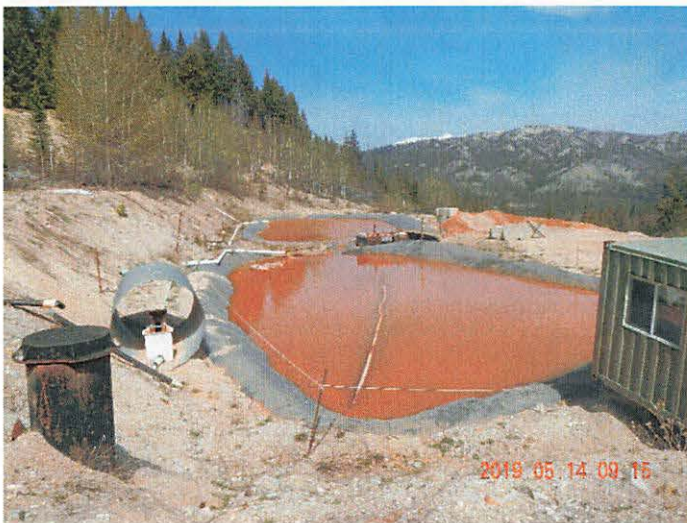


Photo #:03 (DSCN1724)

Description: Facing northwest, photo of Pond #1 (North Pond) and Pond #2 (South Pond).

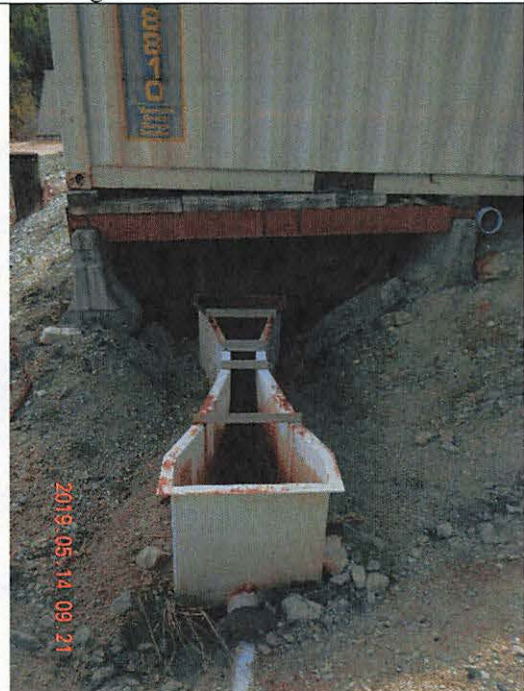


Photo #:04 (DSCN1725)

Description: Facing southeast, photo of the upper Parshall Flume used for a portion of the influent flow monitoring. The upper Flume receives adit water from the sump and directs flow to Pond #1 and/or Pond #2).

Photo Log – Atlanta Gold Corporation



Photo #:05 (DSCN1726)

Description: Facing south, photo of Pond #1 (North Pond).



Photo #:06 (DSCN1727)

Description: Facing east, photo of showing access portals to underground Tanks #1 and #2. Tank #1 (left) cells 1 & 2, Tank #2 (right) cells 3 & 4. Water from Tank #2, Cell 3 was overflowing and infiltrating at the time of inspection.



Photo #:07 (DSCN1728)

Description: Facing east, photo of the effluent Parshall Flume.

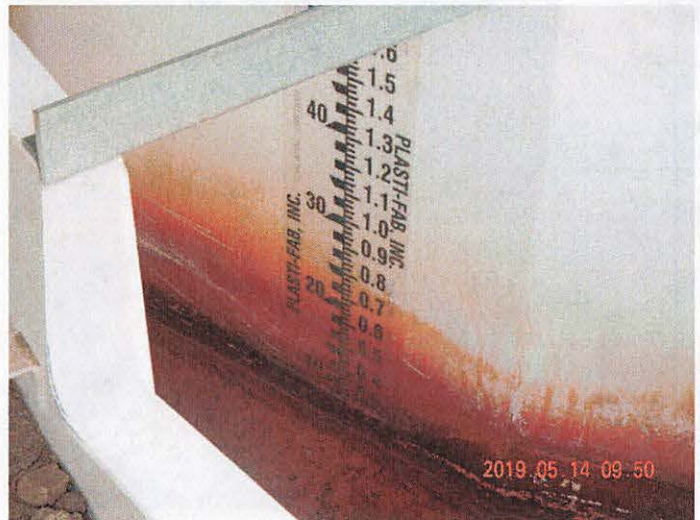


Photo #:08 (DSCN1729)

Description: Photo of the measurement chart on the effluent Parshall Flume.

Photo Log – Atlanta Gold Corporation



Photo #:09 (DSCN1730)

Description: Photo of inside Tank #3. Material includes filter fabric, 3/8-inch gravel, and silica sand.



Photo #:10 (DSC1731)

Description: Photo of inside Tank #3. Material includes filter fabric, 3/8-inch gravel, and silica sand.



Photo #:11 (DSCN1732)

Description: Facing southeast, photo of Tank #3 (right) and Tank #4 (left).



Photo #:12 (DSC1733)

Description: Facing southeast, photo of the effluent discharge into Montezuma Creek (Outfall 001).

Photo Log – Atlanta Gold Corporation



Photo #:13 (DSCN1734)

Description: Facing west, photo of Pond #2 (South Pond).

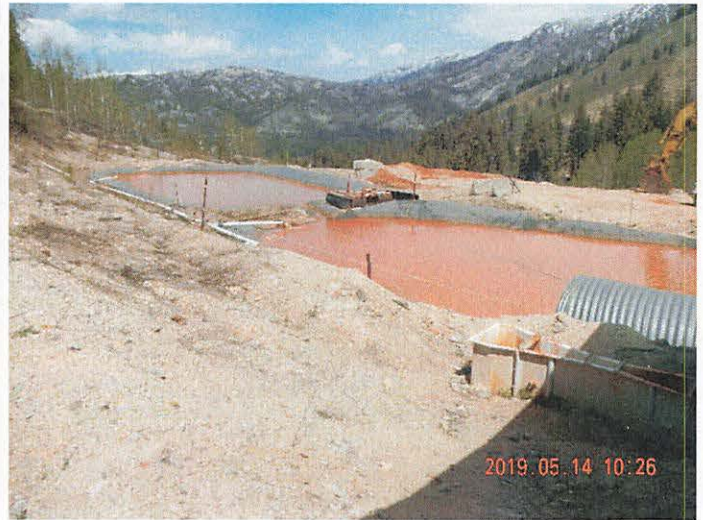


Photo #:14 (DSC1735)

Description: Facing north, photo of Pond #1 (North Pond), Pond #2 (South Pond).



Photo #:15 (DSCN1736)

Description: Facing south, photo of the entrance to the 900 Level Adit.



Photo #:16 (DSCN1737)

Description: Facing south, along Mine Hill Road north of the facility. Jim Inama originally thought the waterbody pictured was Montezuma Creek, following the inspection he confirmed it was East Montezuma Creek which combines with the facility's receiving water (Montezuma Creek).

Photo Log – Atlanta Gold Corporation

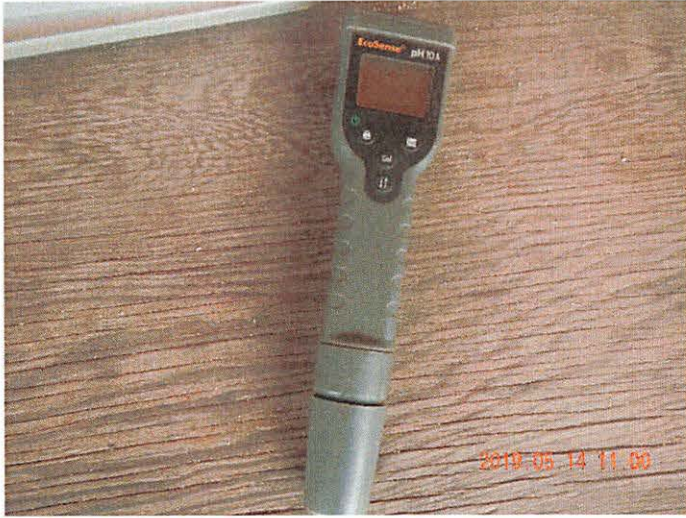


Photo #:17 (DSCN1738)

Description: Photo of the pH meter used at the facility, EcoSense pH 10A.

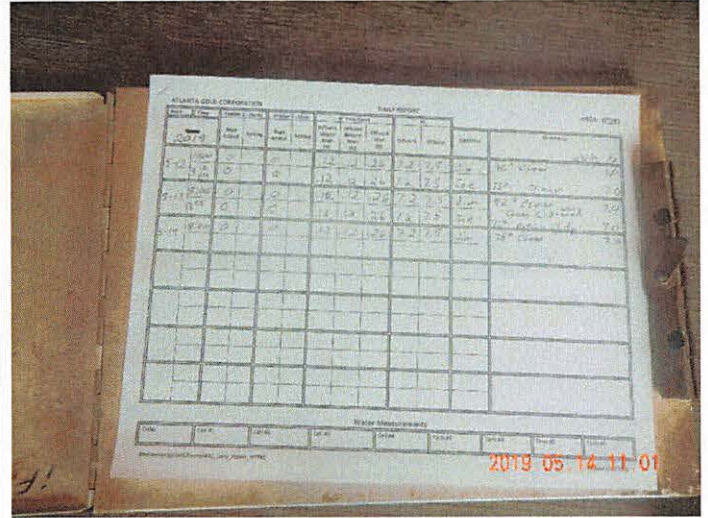


Photo #:18 (DSC1739)

Description: Photo of the "Daily Report" filled out twice a day, noting operator, time/date, pH, flow, quantity of additives, and weather.

ATTACHMENT C

ICIS 5-year Exceedance Report

Facility Information

FRS Facility UIN	110024568751
NPDES ID	IDG910006
Permit Name	ATLANTA GOLD CORPORATIO
Major/Minor	Minor
Permit SIC Desc	Gold Ores
Water Body Name	MONTEZUMA CR
TMDL ID	

Facility Location

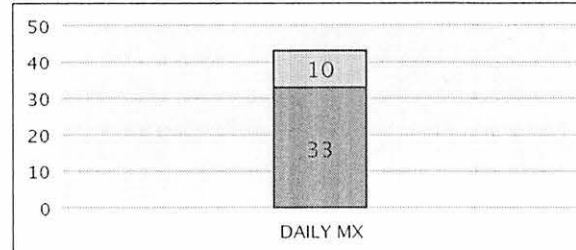
LAT	43.791903
LONG	-115.112008

Last Formal Enforcement Action

EA Identifier	
Final Order Issued	
EA Type Desc	

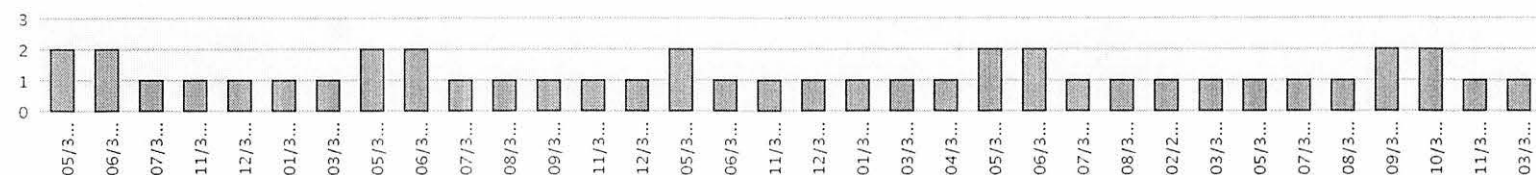
Permit Information

Original Issue Date	4/27/07
Issue Date	4/27/07
Effective Date	8/6/09
Expiration Date	6/30/12
Permit Status	ADC



Number and Months of Violations

43	34
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Month	Outfall	Parameter Code and Name	DMR Value	Permit Limit	% Exceeda	Limit Type	#V	Due/Rec'd	#DL
MAY 2014	001 A	00978 Arsenic, total recoverable	659	10 ug/L	6,490	DAILY MX	1	6/15 6/13	
MAY 2014	001 A	00980 Iron, total recoverable	5510	1000 ug/L	451	DAILY MX	1	6/15 6/13	
JUN 2014	001 A	00978 Arsenic, total recoverable	1216	10 ug/L	12,060	DAILY MX	1	7/15 7/17	2
JUN 2014	001 A	00980 Iron, total recoverable	9400	1000 ug/L	840	DAILY MX	1	7/15 7/17	2
JUL 2014	001 A	00978 Arsenic, total recoverable	17	10 ug/L	70	DAILY MX	1	8/15 8/13	
NOV 2014	001 A	00978 Arsenic, total recoverable	56	10 ug/L	460	DAILY MX	1	12/15 12/15	
DEC 2014	001 A	00978 Arsenic, total recoverable	32	10 ug/L	220	DAILY MX	1	1/15 1/16	1
JAN 2015	001 A	00978 Arsenic, total recoverable	13	10 ug/L	30	DAILY MX	1	2/15 2/13	
MAR 2015	001 A	00978 Arsenic, total recoverable	13	10 ug/L	30	DAILY MX	1	4/15 4/10	
MAY 2015	001 A	00978 Arsenic, total recoverable	179	10 ug/L	1,690	DAILY MX	1	6/15 6/16	1
MAY 2015	001 A	00980 Iron, total recoverable	3520	1000 ug/L	252	DAILY MX	1	6/15 6/16	1
JUN 2015	001 A	00978 Arsenic, total recoverable	342	10 ug/L	3,320	DAILY MX	1	7/15 7/17	2
JUN 2015	001 A	00980 Iron, total recoverable	3430	1000 ug/L	243	DAILY MX	1	7/15 7/17	2
JUL 2015	001 A	00978 Arsenic, total recoverable	11	10 ug/L	10	DAILY MX	1	8/15 8/13	
AUG 2015	001 A	00978 Arsenic, total recoverable	12	10 ug/L	20	DAILY MX	1	9/15 9/17	2
SEP 2015	001 A	00978 Arsenic, total recoverable	11	10 ug/L	10	DAILY MX	1	10/15 10/14	
NOV 2015	001 A	00978 Arsenic, total recoverable	35	10 ug/L	250	DAILY MX	1	12/15 12/18	3
DEC 2015	001 A	00978 Arsenic, total recoverable	27	10 ug/L	170	DAILY MX	1	1/15 1/19	4
MAY 2016	001 A	00978 Arsenic, total recoverable	310	10 ug/L	3,000	DAILY MX	1	6/15 6/17	2
MAY 2016	001 A	00980 Iron, total recoverable	6450	1000 ug/L	545	DAILY MX	1	6/15 6/17	2
JUN 2016	001 A	00980 Iron, total recoverable	2040	1000 ug/L	104	DAILY MX	1	7/15 7/13	
NOV 2016	001 A	00978 Arsenic, total recoverable	11	10 ug/L	10	DAILY MX	1	12/15 12/19	4
DEC 2016	001 A	00978 Arsenic, total recoverable	40	10 ug/L	300	DAILY MX	1	1/15 1/13	
JAN 2017	001 A	00978 Arsenic, total recoverable	12	10 ug/L	20	DAILY MX	1	2/15 2/09	
MAR 2017	001 A	00978 Arsenic, total recoverable	22	10 ug/L	120	DAILY MX	1	4/15 4/11	
APR 2017	001 A	00978 Arsenic, total recoverable	123	10 ug/L	1,130	DAILY MX	1	5/15 5/15	
MAY 2017	001 A	00978 Arsenic, total recoverable	807	10 ug/L	7,970	DAILY MX	1	6/15 6/13	
MAY 2017	001 A	00980 Iron, total recoverable	7230	1000 ug/L	623	DAILY MX	1	6/15 6/13	
JUN 2017	001 A	00978 Arsenic, total recoverable	409	10 ug/L	3,990	DAILY MX	1	7/15 7/12	
JUN 2017	001 A	00980 Iron, total recoverable	3130	1000 ug/L	213	DAILY MX	1	7/15 7/12	
JUL 2017	001 A	00978 Arsenic, total recoverable	43	10 ug/L	330	DAILY MX	1	8/15 8/15	
AUG 2017	001 A	00978 Arsenic, total recoverable	22	10 ug/L	120	DAILY MX	1	9/15 9/12	
FEB 2018	001 A	00978 Arsenic, total recoverable	11	10 ug/L	10	DAILY MX	1	3/15 3/15	
MAR 2018	001 A	00978 Arsenic, total recoverable	15	10 ug/L	50	DAILY MX	1	4/15 4/11	

MAY 2018	001 A	00978 Arsenic, total recoverable	33	10 ug/L	230	DAILY MX	1	6/15	6/13
JUL 2018	001 A	00978 Arsenic, total recoverable	14	10 ug/L	40	DAILY MX	1	8/15	8/15
AUG 2018	001 A	00978 Arsenic, total recoverable	29	10 ug/L	190	DAILY MX	1	9/15	9/14
SEP 2018	001 A	00978 Arsenic, total recoverable	538	10 ug/L	5,280	DAILY MX	1	10/15	11/15 31
SEP 2018	001 A	00980 Iron, total recoverable	4440	1000 ug/L	344	DAILY MX	1	10/15	11/15 31
OCT 2018	001 A	00978 Arsenic, total recoverable	126	10 ug/L	1,160	DAILY MX	1	11/15	11/15
OCT 2018	001 A	00980 Iron, total recoverable	2550	1000 ug/L	155	DAILY MX	1	11/15	11/15
NOV 2018	001 A	00978 Arsenic, total recoverable	14	10 ug/L	40	DAILY MX	1	12/15	12/14
MAR 2019	001 A	00978 Arsenic, total recoverable	16	10 ug/L	60	DAILY MX	1	4/15	4/15

ATTACHMENT D

May 23, 2019 Email Correspondence with Becky Shull

From: Becky Shull
To: Klemesrud, Jon
Subject: Atlanta Site Visit
Date: Thursday, May 23, 2019 10:39:37 AM

<https://www.dropbox.com/sh/m0352l03eqax642/AADq0x6EaDyKotP-pxTI-ZQ9a?dl=>

Hi John,

You should be receiving a link from dropbox.com so you can access the lab reports. I've also copied the link above in case you have any problems.

In answer to your questions:

Wm. Ernest Simmons resigned 06/30/17

Allan Folk became Acting President when the interim resigned 12/14/18 and confirmed President 02/25/19

I checked the OM/QA Manual and the updates have been added to the document so I will send it up to the site so they can give me input on any changes.

Once they get back to me and Allan reviews it, I'll make sure the update is distributed.

Let me know if you have any additional questions.

Becky Shull
Atlanta Gold Corporation
P.O. Box 94
Star, ID 83669
208-424-3343